

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

MAGTEN ASSET MANAGEMENT CORPORATION	:	
and LAW DEBENTURE TRUST COMPANY OF NEW	:	
YORK,	:	
	:	
Plaintiffs,	:	C.A. No. 04-1494-JJF
	:	
v.	:	
	:	
NORTHWESTERN CORPORATION,	:	
	:	
Defendant.	:	
	:	
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MAGTEN ASSET MANAGEMENT CORPORATION,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A. No. 05-0499-JJF
	:	
MIKE J. HANSON & ERNIE J. KINDT,	:	
	:	
Defendants.	:	
	:	

REQUEST FOR ORAL ARGUMENT AND NOTICE OF COMPLETION OF BRIEFING

In accordance with this Court's procedures and Local Rules 7.1.2 and 7.1.4, NorthWestern Corporation ("NorthWestern"), by and through its counsel, Greenberg Traurig, LLP and Curtis, Mallet-Prevost, Colt & Mosle LLP, hereby notifies the Court that briefing on NorthWestern, Mike J. Hanson and Ernie J. Kindt's (collectively, the "Defendants") Joint Motion for Protective Order Pursuant to Fed.R.Civ.P. 26(c) and Local Rule 30.2 (the "Motion") [Docket No. 151] is complete.

On April 19, 2007, NorthWestern filed the Motion together with its Memorandum in Support of Motion [Docket No. 152] and Affidavit of Joseph D. Pizzurro, Esq. in Support of the Motion [Docket No. 153]. On May 3, 2007, Magten Asset Management Corporation and Law

Debenture Trust Company of New York filed their Memorandum of Law in Opposition to Defendants' Joint Motion for a Protective Order [Docket No. 180]. On May 10, 2007, Defendants' filed their Reply Memorandum [Docket No. 186] and Supplemental Affidavit of Joseph D. Pizzurro, Esq. in Support of the Reply Memorandum [Docket No. 187]. Accordingly, all briefing related to the Motion has been completed.

Pursuant to Local Rule 7.1.4, NorthWestern hereby requests that oral argument be held on the Motion at the Court's earliest convenience.

Dated: May 15, 2007

GREENBERG TRAURIG LLP

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and

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MAGTEN ASSET MANAGEMENT)
CORPORATION and LAW DEBENTURE)
TRUST COMPANY OF NEW YORK,)
)
Plaintiffs,)
)
v.) C.A. No. 04-1494 (JJF)
)
NORTHWESTERN CORPORATION,)
)
Defendant.)
)
MAGTEN ASSET MANAGEMENT CORP.,)
)
Plaintiff,)
)
v.) C.A. No. 05-499 (JJF)
)
MIKE J. HANSON and ERNIE J. KINDT,)
)
Defendants.)

CERTIFICATE OF SERVICE

I, Dennis A. Meloro, being duly sworn according to law, deposes and says that I am employed by Greenberg Traurig, LLP, which is counsel for the NorthWestern Corporation, and that on the 15th of May 2007, I caused to be served copies of the REQUEST FOR ORAL ARGUMENT AND NOTICE OF COMPLETION OF BRIEFING upon the parties listed below via Electronic Mail, Hand Delivery upon Local Counsel and via First Class, United States Mail upon the remaining parties.

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Date: May 15, 2007

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